

Exponent®

Confidential to CBI



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January 3, 2008

TSCA Confidential Business Information Center (7407M)
EPA East – Room 6428 Attn: FYI
U.S. Environmental Protection Agency
1201 Constitution Avenue, NW
Washington, DC 20004-3302



Re: FYI Notification: Alkyl Ammonium Chloride Salts
CAS # 70750-47-9

08 JAN - 2 11:22

To Whom It May Concern:

On behalf of our client the Joint Inerts Task Force (JITF) Cluster Support Team 7 (JITF CST 7) (1156 15th St. N.W., Suite 400, Washington, D.C. 20005), Exponent, Inc. is submitting information pursuant to the provisions of Section 8(e) of the Toxic Substance Control Act (TSCA). The JITF CST 7 includes the following member companies: Akzo Nobel Surface Chemistry, LLC, Bayer Crop Science, Monsanto, and Syngenta.

Please note that the information presented in this letter contain study results, not all of which are reportable under TSCA 8(e).

The JITF CST 7 is conducting a range-find study with CAS # 70750-47-9. The results of the range-find study will be used to set doses for a definitive Combined Repeated Dose Toxicity Study with a Reproduction/Developmental Toxicity Screening Test (OECD 442 – OPPTS 870.3650).

A range-finding study is ongoing to set appropriate dose levels for the above-referenced definitive study. It will also be used to determine the Maximum Tolerated Dose (MTD). The test substance is being administered via oral gavage to groups of 3 male and 3 female rats at dosages of 0, 20, 60 and 180 mg/kg/day. Dosages are adjusted using a correction factor of 1.33 to account for purity of the test substance (75%) for the purpose of dosage calculation. The dose levels were chosen on the basis of an acute oral toxicity study in which the dose of 300 mg/kg caused 20% mortality.

One male and two female rats in the highest dose group (180 mg/kg) were found dead after 4 days of treatment. Body weight losses were recorded in rats of both sexes since the beginning of treatment, amounting to a mean weight loss of 16.6 g in males (range 14-19 g) and 12.6 g in females (range 2-19 g) in four days of treatment. Food consumption was also reduced. Rales, piloerection, and ventral recumbency were noted on day 3.

As the remaining animals were showing the same clinical signs, the group was terminated for ethical reasons.

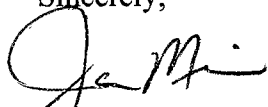
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The in-life part of the range-find study is scheduled to be complete in January 2008, and a letter report should be available in February 2008.

JITF CST 7 asserts that none of the information contained within this notice constitutes confidential business information.

If you have any questions, please contact me by phone at (202) 772-4932.

Sincerely,

A handwritten signature in black ink, appearing to read "James Messina". The signature is fluid and cursive, with a large initial "J" and "M".

James Messina
Authorized Representative of
Joint Inerts Task Force CST 7

cc: JITF CST 7
Angelina Duggan, Exponent
Michela Dall'Osto, Exponent